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6 UNITED STATES DISTRICT COURT
7 FOR THE EASTERN DISTRICT OF CALIFORNIA

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9 UNITED STATES OF AMERICA, } Case No.: 2:22-cr-00161-JAM
10 Plaintiff, } STIPULATION AND ORDER TO
11 vs. } CONTINUE STATUS CONFERENCE
12 JAMES MECHAM, et al. } Date: November 15, 2022
13 Defendants } Time: 9:00 a.m.
14 } Judge: Hon. Judge John A. Mendez

15

16 **STIPULATION**

17 Plaintiff United States of America, by and through its attorney of record, Assistant
18 United States Attorney HEIKO COPPOLA, and defendant JAMES MECHAM, both
19 individually and by and through his counsel of record, Thomas A. Johnson and Monica
20 A. Quinlan, defendant KURT STOCKS, both individually and by and through his
21 counsel of record, Malcolm S. Segal, and defendant HEIDI EDWARDS, both
22 individually and by and through her counsel of record, Christina Sinha, hereby stipulate
23 as follows:

24 1. By previous order, this matter was set for Status Conference on November 15,
25 2022.

26 2. By this stipulation, defendant now moves to continue the Status Conference to
27 January 31, 2023, at 9:00 a.m., before the Honorable Judge John A. Mendez.

28 3. The parties agree and stipulate, and request the Court find the following:

- 1 a. A continuance is requested because counsel for all defendants need additional
2 time to review the discovery, conduct investigation, evaluate the case, and
3 discuss a potential resolution.
- 4 b. Counsel for all defendants believe the failure to grant a continuance in this case
5 would deny defense counsel reasonable time necessary for effective
6 preparation, taking into account the exercise of due diligence.
- 7 c. The Government does not object to the continuance.
- 8 d. Based on the above-stated findings, the ends of justice served by granting the
9 requested continuance outweigh the best interests of the public and the
10 defendants in a speedy trial within the original date prescribed by the Speedy
11 Trial Act.
- 12 e. For the purpose of computing time under the Speedy Trial Act, 18 United
13 States Code Section 3161(h)(7)(A) within which trial must commence, the
14 time period of November 15, 2022, to January 31, 2023, inclusive, is deemed
15 excludable pursuant to 18 United States Code Section 3161(h)(7)(A) and
16 (B)(iv), corresponding to Local Code T-4 because it results from a continuance
17 granted by the Court at defendant's request on the basis of the Court's finding
18 that the ends of justice served by taking such action outweigh the best interest
19 of the public and the defendant in a speedy trial.

20 4. Nothing in this stipulation and order shall preclude a finding that other provisions
21 of the Speedy Trial Act dictate that additional time periods are excludable from
22 the period within which a trial must commence.

23
24 **IT IS SO STIPULATED.**

25 DATE: November 4, 2022

26 /s/ Thomas A. Johnson
27 THOMAS A. JOHNSON
28 Attorney for James Mecham

1 DATE: November 4, 2022

2 /s/ Monica A. Quinlan
3 MONICA A. QUINLAN
4 Attorney for James Mecham

5 DATED: November 4, 2022

6 PHILIP A. TALBERT
7 Acting United States Attorney

8 DATE: November 4, 2022

9 /s/ Heiko Coppola
10 HEIKO COPPOLA
11 Assistant U.S. Attorney

12 DATE: November 4, 2022

13 /s/ Malcolm S. Segal
14 MALCOLM S. SEGAL
15 Attorney for Kurt Stocks

16
17
18 IT IS SO ORDERED.

ORDER

19
20 DATE: November 8, 2022

21 /s/ John A. Mendez
22 THE HONORABLE JOHN A. MENDEZ
23 SENIOR UNITED STATES DISTRICT JUDGE